

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
Harrisonburg**

RLI INSURANCE COMPANY,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 5:18CV00066-MFU-JCH
)	
NEXUS SERVICES, INC.,)	
LIBRE BY NEXUS, INC.,)	
HOMES BY NEXUS, INC.,)	
)	
Defendants.)	
_____)	

MOTION FOR ISSUANCE OF WRIT OF GARNISHMENT

Pursuant to applicable Federal Rules of Civil Procedure, including Rule 64, Plaintiff/Judgment Creditor RLI Insurance Company (“RLI”), through its undersigned counsel of record, hereby motion this Court to issue a writ of garnishment after judgment by stating that:

1. On June 2, 2023, this Court entered Judgment against Michael Donovan (“Judgment Debtor”), for the amount of \$315,000.00.
2. To date, there still remains due and unpaid a balance of \$275,000.00 on the Judgment.
3. RLI motions this Court to issue a Writs of Garnishment to Judgment Debtor’s employers as follows:
 - a. Nexus Services, Inc., c/o Michael Donovan, President, 47 S. Windsong Court, Fishersville, Virginia 22939.
 - b. Libre by Nexus, Inc. c/o Michael Donovan, President, 47 S. Windsong Court, Fishersville, Virginia 22939.

c. Subversivo LLC, c/o David See, Manager, 1201 Fannin Street, Suite 262,
Houston, Texas 77002.

Dated: January 5, 2024

RLI INSURANCE COMPANY

/s/ *Dustin M. Paul*

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